

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

EPIC SYSTEMS CORPORATION
1979 Milky Way,
Verona, WI 53593,

Plaintiff,

v.

Case No. 12-cv-848

KS Information Technologies LLC,
3545 Saint Johns Bluff Road South # 186,
Jacksonville, FL 32224,

Subhash Kanukunta,
3545 Saint Johns Bluff Road South # 186,
Jacksonville, FL 32224,

K-Soft Information Technologies, Inc.
27301 Dequindre Rd,
Madison Heights, MI 48071,

K-Soft Infotech Corporation
4488 Ecton Lane
Jacksonville, FL 32246,

Ramesh Kumar Gangiseti
4488 Ecton Lane,
Jacksonville, FL 32246,

Defendants,

MOTION TO SEAL COMPLAINT

Plaintiff, Epic Systems Corporation (“Epic”), by its attorneys, Quarles & Brady LLP,
moves to seal its Complaint against the Defendants. Epic’s Complaint details a scheme by which

Defendants have used gained unauthorized access to Epic's computers and misappropriated Epic's confidential, trade secret, and proprietary information about Epic's software. Epic does not want to publicize the methods used by Defendants to access its computers that are referenced in the Complaint. Accordingly, out of an abundance of caution, Epic moves the Court for file the Complaint under seal. Epic further moves that the Court order Defendants to maintain the Complaint in confidence and not disclose it to third parties except attorneys they may retain to defend them in this action.

Dated this 26th day of November, 2012.

QUARLES & BRADY LLP

/s/ Josephine K. Benkers

Anthony A. Tomaselli

State Bar No. 1003673

Anthony.tomaselli@quarles.com

Josephine K. Benkers

State Bar No. 1030608

josephine.benkers@quarles.com

QUARLES & BRADY LLP

33 East Main Street

Suite 900

Madison, WI

(608) 251-5000

Fax: (608) 251-9166

Attorneys for Epic Systems Corporation